

# Katten

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March 9, 2023

**BY ECF**

Hon. Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2260  
New York, NY 10007

**Re: *United States of America and States of the United States, ex rel.  
Donohue v. Richard Carranza, et al.*, 1:20-CV-5396 (GHW)**

Dear Judge Woods:

This firm, along with the New York City Law Department, represents defendants New York City Department of Education and its former Chancellors, Richard Carranza and Meisha Porter (collectively, “NYC DOE”) in the above-referenced case.

NYC DOE plans to file a motion for attorneys’ fees, which the Court may award to prevailing defendants in accordance with 31 U.S.C. § 3730(d)(4). Per Federal Rule of Civil Procedure 54(d)(2)(B)(i), such motion is currently due on March, 14, 2023. NYC DOE respectfully requests additional time to prepare its motion so that we can properly evaluate the relevant legal standards and their applicability to the claims in this case. Thus, pursuant to Rule 1(E) of the Court’s Individual Rules of Practice in Civil Cases, NYC DOE respectfully requests that the time to file such motion be extended by 30 days to April 13, 2023. This is the first request for an extension of time to file this motion. Counsel for Plaintiff-Relator has informed us that Plaintiff-Relator does not object to this request.

Respectfully,

/s/ Joseph V. Willey  
Joseph V. Willey

Cc: All counsel of record, via ECF